RENE L. VALLADARES 1 Federal Public Defender State Bar No. 11479 2 **BRIAN PUGH** Assistant Federal Public Defender 3 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 4 (702) 388-6577/Phone (702) 388-6261/Fax 5 Brian Pugh@fd.org 6 Attorney for Martell Jamal Brown 7

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Plaintiff, v. MARTELL JAMAL BROWN,

UNITED STATES OF AMERICA,

Case No. 2:15-cr-157-RFB

STIPULATION TO CONTINUE REVOCATION HEARING

(First Request)

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United States Attorney, and Daniel Cowhig, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender, counsel for Martell Jamal Brown, that the Revocation Hearing currently scheduled on October 18, 2018 at the hour of 3:00pm, be vacated and continued to a date and time convenient to the Court, but no sooner than ninety (90) days.

This Stipulation is entered into for the following reasons:

1. The parties, with the concurrence of the supervising probation officer, jointly request that the Court continue the revocation hearing for 90 days to allow time for Mr. Brown

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1	to complete Phase I of the CARE program. Successful completion of the CARE program would	
2	bear on the Court's adjudication of the petition.	
3	2. The defendant is not in custody and agrees with the need for the continuance.	
4	3. The parties agree to the continuance.	
5	This is the first request for a continuance of the revocation hearing.	
6	DATED this 17th day of October, 2018.	
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8	RENE L. VALLADARES Federal Public Defender	DAYLE ELIESON United States Attorney
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10	/s/ Brian Pugh By	/s/ Daniel Cowhig By
11	BRIAN PUGH	DANIEL COWHIG
12	Assistant Federal Public Defender	Assistant United States Attorney
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA UNITED STATES OF AMERICA, Plaintiff, v. MARTELL JAMAL BROWN, Defendant. the hour of 2:30 p.m. DATED this 17th day of October, 2018.

Case No. 2:15-cr-157-RFB

ORDER

IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for Thursday, October 18, 2018 at 3:00 p.m. be vacated and continued to January 16, 2019

> RICHARD F. BOULWARE, II **United States District Court**